

AAS:SME

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

STIPULATION

BO MAO,

No. 19-CR-392 (PKC)

Defendant.

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IT IS HEREBY STIPULATED AND AGREED by and between the UNITED STATES OF AMERICA and the defendant BO MAO, by their undersigned attorneys:

1. Draft transcripts and draft English-language translations of audio or video recordings, or of non-English written materials provided to the defendant by the United States or copies, redacted copies, or any portions thereof (“Draft Transcripts and Translations”) cannot be used in any proceeding by any person, including persons who are not parties to this case;

2. The use of Draft Transcripts and Translations by the defendant is limited to plea negotiations and trial preparation for this case and the Draft Transcripts and Translations may not be used at trial by the defendant in any form or for any purpose whatsoever, including use in cross-examination of any witness;

3. Draft Transcripts and Translations that are translations of Discovery Materials, as defined in the Protective Order in this case (ECF Docket Entry No. 30), shall be

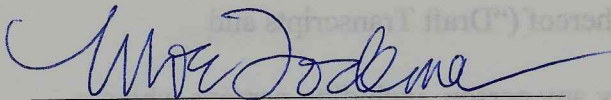
deemed to have the same sensitivity designation as the underlying Discovery Materials, and shall receive the same protections as the underlying Discovery Materials;

4. All Draft Transcripts and Translations, including all copies of such transcripts and translations, whether in the possession of defense counsel or the defendant, will be returned to the United States when final transcripts and translations are provided by the United States or when the jury is sworn in this case, whichever occurs first.

Dated: Brooklyn, New York
April 16, 2020

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York

By: /s/ Sarah M. Evans
Alexander A. Solomon
Sarah M. Evans
Assistant U.S. Attorneys



Moe Fodeman, Esq.
Counsel to BO MAO